

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

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|---|---|--------------------------------|
| HOWARD BLAND, JR. and DAVID RUPP, |) | |
| Individually and on Behalf of All Other |) | |
| Persons Similarly Situated, |) | |
| |) | |
| Plaintiffs, |) | Civil Action No. 2:12-cv-01407 |
| |) | |
| v. |) | Judge Terrence F. McVerry |
| |) | |
| CALFRAC WELL SERVICES CORP. and |) | <i>Electronically Filed</i> |
| CALFRAC WELL SERVICES LTD., |) | |
| |) | |
| Defendants. |) | |

JOINT DISCOVERY PLAN FOR PHASES 2 AND 3 OF DISCOVERY

Pursuant to this Court's August 12, 2013 Order Granting Approval of Conditional Certification Notice (D.E. No. 43), Plaintiffs Howard Bland, Jr., David Rupp, and the other opt-ins who have joined this litigation ("Plaintiffs"), and Defendant Calfrac Well Services Corp. ("Defendant" or "Calfrac") (collectively, "the parties") hereby submit their joint proposed discovery plan for Phases 2 and 3 of discovery for which the court will hold a status conference to discuss. The parties request a six- month period from the date of the status conference for Phases 2 and 3 of discovery as to issues related to final certification and the merits of any claims or defenses.

Respectfully submitted,

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